

EAST COLUMBIA BASIN IRRIGATION DISTRICT

MAR 24 2000

55 North 8th
P.O. Box E

OTHELLO, WASHINGTON 99344

Phone 509 488 9671
Fax 509 488 6433

March 23, 2000

Department of the Army
Walla Walla District Corps of Engineers
201 North Third Avenue
Walla Walla, WA 99362-1876

Attention: Lower Snake River Study

The East Columbia Basin Irrigation District is one of three irrigation districts operating the Bureau of Reclamation's Columbia Basin Project. The East District operates canals serving the Moses Lake, Warden and Othello areas providing irrigation water to over 2400 farms, individuals and other businesses with a total irrigated service area of 152,000 acres. The source of this water is the Columbia River at Grand Coulee Dam.

1 | **The East District supports Alternative 1** (Existing Conditions) **and/or Alternative 2** (Maximum Transport of Juvenile Salmon) of the Draft Lower Snake River Juvenile Salmon Migration Feasibility Report/Environmental Impact Statement **with the exception of the flow augmentation strategies contained in those two alternatives.**

Present flow augmentation targets, based largely on the 1995 Biological Opinion, call for up to 16 million acre feet per year of flow augmentation. 427,000 acre feet of that comes from the Snake River above Brownlee. Most of the balance comes from the mainstem Columbia.

2 | These flow targets exceed the levels that can be successfully shaped by the existing U.S. storage system at the times they are called for. There is mounting evidence that these high levels of flows are not producing the outmigration survival benefits they're intended to produce.

In spite of this, the Lower Snake River EIS fails to offer alternatives that consider reducing or reshaping flow augmentation. **Such alternatives need to be considered.**

1 |
cont. | Enclosed for your reference is a complete copy of a February 1998 report entitled "The Columbia - Snake River Flow Targets/Augmentation Program". The report was prepared by a study team of reputable biologists and economists. The report generates no additional science but analyzes already existing Federal Caucus data to conclude present flow augmentation targets are excessive and ineffectual. Figure 2, preceding page 13 of that report presents data indicating present flow targets are hydrologically unrealistic. Figure 10 following page 20 presents NMFS research confirming there is no outmigration survival benefit provided by the present flow targets. The years presented are 1994 (a dry year), 1995 (an average year) and 1996 (a wet year). Survival is measured across a range of flows for each year. If more water equaled more survival, a mean or median line drawn through the data points would slope upwards from left to right. The slope is flat, confirming the lack of a flow-survival relationship. This figure does point out that survival is better in wetter years than in drier years but shaping

1
cont. mainstream flows to mimic wetter years does not result in wetter year survival conditions for average or dry years. This report concludes and recommends that mainstream Columbia flow augmentation targets should not be higher than 4 maf and that Snake River targets should not be higher than the current 427,000 acre feet target. The report also suggests that these levels of flow augmentation may provide better benefits if used in late summer or fall.

The present levels of flow augmentation are causing problems and costs for the East District's service area. These flow targets have caused the Bureau of Reclamation to place an administrative moratorium on the use of 85,000 acre feet of previously authorized Columbia Basin Project water which has eliminated the option for the use of additional surface water for agricultural, municipal or industrial purposes in the District's service area. This same area is also experiencing a shortage of groundwater, the current source for most industrial and municipal uses and a significant portion of agricultural use. The present flow augmentation targets are constraining most opportunities for agricultural, industrial and municipal growth in this area. Such a constraint is not appropriate in view of the lack of an overwhelmingly apparent flow-survival relationship.

The East District strongly opposes Alternative 4 (Dam Breaching). Breaching those dams would result in higher energy costs for East District farmers and could result in increased transportation costs for their agricultural supplies and crops.

The costs to eastern Washington as a whole though cause the East District to oppose breaching those dams for reasons beyond just the direct local impacts. The loss of 37,000 highly productive irrigated acres, the loss of 5% of the region's hydropower capacity and the loss of navigation to much of the inland northwest are extremely excessive in view of the statistical, highly theoretical and the long term (50 year) nature of any improvement in salmon recovery.

In addition to the excessive costs and uncertain benefits the dam breaching alternatives should be dropped because the divisiveness of these proposals detract from the region's ability to focus on achievable salmon recovery measures.



Richard L. Erickson
Secretary-Manager

RLE:jd

Enclosure